

# **EXHIBIT A**

## **Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Old Carco LLC, *et al.*

Debtors.

Chapter 11

Case No. 09-50002 (DSJ)

Jointly Administered

**ORDER GRANTING FCA US LLC'S MOTION TO ENFORCE  
THE COURT'S SALE ORDER [DOCKET NO. 3232]**

Upon the motion (the "Motion")<sup>1</sup> of FCA US LLC ("FCA US") for entry of an order (this "Order") enforcing this Court's Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Interests and Encumbrances, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith and Related Procedures and (III) Granting Related Relief [Docket No. 3232] (the "Sale Order"); this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and venue of these chapter 11 cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided; and a hearing on the Motion having been held before the Court on \_\_\_\_\_, 2021 (the "Hearing"); and the Court having considered the filings of the parties and the arguments of counsel made at the Hearing; and after due deliberation thereon and upon the record established at the Hearing;

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. All claims in the Takata MDL, *In re Takata Airbag Product Liability Litigation*, MDL No. 15-02599, Economic Loss No. 14-24009 (S.D. Fla.), based on economic losses arising from the purchase or lease of a vehicle that was manufactured and sold by Old Chrysler before June 10, 2009 are barred and enjoined by the Sale Order.
3. The requirements set forth in Local Rule 9013-1(b) are satisfied.
4. The Court shall retain non-exclusive jurisdiction with respect to all matters arising from or related to the implementation and interpretation of this Order.

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
Honorable David S. Jones  
United States Bankruptcy Judge